

**FILED**

OCT 21 2015

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

DAVID GREWS, CLERK  
BY *[Signature]* Deputy

UNITED STATES OF AMERICA

v.

CRIMINAL CASE NO. 3:15CR060

VERONICA LLOYD

18 U.S.C. § 641  
18 U.S.C. § 1029(a)(5)  
18 U.S.C. § 912  
26 U.S.C. § 7212(a)

**SUPERSEDING INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

On or about the 19<sup>th</sup> day of March, 2014, in the Northern District of Mississippi, VERONICA LLOYD, defendant, did knowingly steal, purloin and convert to her own use and the use of others and did cause the same, a thing of value of the United States and of a department or agency thereof, the aggregate amount of which exceeded \$1,000.00, that is, United States Treasury tax refund check number 4034 11321119 issued to Wade Brown, to which she was not entitled, in the amount of \$6,206.00, in violation of Title 18, United States Code, Section 641.

**COUNT TWO**

On or about the 3<sup>rd</sup> day of April, 2014, in the Northern District of Mississippi, VERONICA LLOYD, defendant, did knowingly convert to her own use and the use of others and did cause the same,, and did without authority, did sell, convey and dispose of a thing of value of the United States and of a department or agency thereof, the aggregate amount of which exceeded \$1,000.00, that is, United States Treasury tax refund check number 4034 14691413 issued to Priscilla Twilley, to which she was not entitled, in the amount of \$1,731.00, in violation of Title 18, United States Code, Section 641.

**COUNT THREE**

From on or about the 18<sup>th</sup> day of February through on or about the 18<sup>th</sup> day of March, 2014, in the Northern District of Mississippi, VERONICA LLOYD, defendant, did knowingly and with intent to defraud, effected forty-four (44) transactions with an access device issued to another person, to-wit: Bancorp Bank debit card in the name of Roger Strickland; and by such conduct, during the time period of March 19, 2013 through March 19, 2014, the defendant received payments and other things of value totaling \$6,750.00; said use in and affecting interstate commerce in that the access device was issued by Bancorp Bank located in a state other than Mississippi, all in violation of Title 18, United States Code, Section 1029(a)(5).

**COUNT FOUR**

From on or about the 18<sup>th</sup> day of February through on or about the 18<sup>th</sup> day of March, 2014, in the Northern District of Mississippi, VERONICA LLOYD, defendant, did knowingly and with intent to defraud, effected twenty-seven (27) transactions with an access device issued to another person, to-wit: Bancorp Bank debit card in the name of Robert Jones; and by such conduct, during the time period of March 19, 2013 through March 19, 2014, the defendant received payments and other things of value totaling \$4,786.00; said use in and affecting interstate commerce in that the access device was issued by Bancorp Bank, located in a state other than Mississippi, all in violation of Title 18, United States Code, Section 1029(a)(5).

**COUNT FIVE**

On or about the 13<sup>th</sup> day of February, 2014, in the Northern District of Mississippi, VERONICA LLOYD, defendant, did falsely assume and pretend to be an officer and employee of the United States acting under the authority thereof, that is, a representative of the Department of the Treasury, Internal Revenue Service, such pretense being false and defendant knowing it

letter on Department of the Treasury, Internal Revenue Service letterhead and mailed the same to Roger Strickland with the intent to prevent Strickland from contacting the Internal Revenue Service and in order to further conceal defendant's conversion of \$6,750.00 of Roger Strickland's tax refund monies for her own personal use, in violation of Title 18, United States Code, Section 912.

**COUNT SIX**

On or about the 14<sup>th</sup> day of February, 2014, in the Northern District of Mississippi, VERONICA LLOYD, defendant, did falsely assume and pretend to be an officer and employee of the United States acting under the authority thereof, that is, a representative of the Department of the Treasury Internal Revenue Service, such pretense being false and defendant knowing it was false, and in such assumed and pretended character did act as such, in that she composed a letter on Department of the Treasury, Internal Revenue Service letterhead and mailed the same to Robert Jones with the intent to prevent Jones from contacting the Internal Revenue Service and in order to further conceal defendant's conversion of \$4,786.00 of Robert Jones' tax refund monies for her own personal use, in violation of Title 18, United States Code, Section 912.

**COUNT SEVEN**

On or about the 27<sup>th</sup> day of March, 2014, in the Northern District of Mississippi, VERONICA LLOYD, defendant, did falsely assume and pretend to be an officer and employee of the United States acting under the authority thereof, that is, a representative of the Department of the Treasury, Internal Revenue Service, such pretense being false and defendant knowing it was false, and in such assumed and pretended character did act as such, in that she composed a letter purporting to be a Department of the Treasury, Internal Revenue Service "Tax Examiner" and mailed the same to Robert Jones with the intent to prevent Jones from contacting the Internal Revenue Service in order to further conceal defendant's conversion of \$4,786.00 of Robert

Jones' tax refund monies for her own personal use, in violation of Title 18, United States Code, Section 912.

**COUNT EIGHT**

On or about the 10<sup>th</sup> day of February, 2014, in the Northern District of Mississippi, VERONICA LLOYD, defendant, did falsely assume and pretend to be an officer and employee of the United States acting under the authority thereof, that is, a representative of the Department of the Treasury, Financial Management Service, such pretense being false and defendant knowing it was false, and in such assumed and pretended character did act as such, in that she intentionally altered a letter from Department of the Treasury, Financial Management Service and mailed the same to Terrance Twilley with the intent to convince Twilley that funds from his tax refund had been withheld to satisfy an outstanding child support debt, all in order to further conceal defendant's conversion of \$4,888.00 of Terrance Twilley's tax refund monies for her own personal use, in violation of Title 18, United States Code, Section 912.

**COUNT NINE**

On or about the 3<sup>rd</sup> day of March, 2014, in the Northern District of Mississippi, VERONICA LLOYD, defendant, did falsely assume and pretend to be an officer and employee of the United States acting under the authority thereof, that is, a representative of the Department of the Treasury, Financial Management Service, such pretense being false and defendant knowing it was false, and in such assumed and pretended character did act as such, in that she intentionally altered a letter from Department of the Treasury, Financial Management Service and mailed the same to Terrance Twilley with the intent to convince Twilley that funds from his tax refund had been withheld to satisfy an outstanding child support debt, all in order to further conceal defendant's conversion of \$4,888.00 of Terrance Twilley's tax refund monies for her own personal use, in violation of Title 18, United States Code, Section 912.

**COUNT TEN**

From on or about March 1, 2014 to on or about March 17, 2014, in the Northern District of Mississippi, VERONICA LLOYD, defendant, did falsely assume and pretend to be an officer and employee of the United States acting under the authority thereof, that is, a representative of the Internal Revenue Service, such pretense being false and defendant knowing it was false, and in such assumed and pretended character did act as such, in that defendant, using a blocked phone number, placed a phone call to Pricilla Twilley regarding the tax refund check of her spouse, Wade Brown during which phone call defendant posed as an Internal Revenue Service agent and urged Twilley to relinquish possession of the refund check to defendant to resolve an over payment issue, all in order to conceal defendant's conversion of \$6,206.00 of Wade Brown's tax refund monies for her own personal use, in violation of Title 18, United States Code, Section 912.

**COUNT ELEVEN**

On or about the 12<sup>th</sup> day of May, 2015, in the Northern District of Mississippi, VERONICA LLOYD, defendant, did knowingly and intentionally, by force and by threats of force, endeavor to intimidate and impede an officer and employee of the United States acting in an official capacity under Title 26 of the United States Code, to-wit, VERONICA LLOYD did assault and attempt to assault Department of the Treasury Special Agent Caroline Cook, by charging her with a shovel, a dangerous weapon, and verbally accosting her, while Special Agent Caroline Cook was engaged in the performance of her official duties, in violation of Title 26, United States Code, Section 7212(a).

  
UNITED STATES ATTORNEY

/s/ Signature Redacted  
FOREPERSON